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## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

Fairfield Sentry Limited, et al.,

Debtors in Foreign Proceedings.

Fairfield Sentry Limited, et al. (In Liquidation), acting by and through the Foreign Representatives thereof,

Plaintiffs,

- against -

Theodoor GGC Amsterdam et al.,

Defendants.

Fairfield Sentry Limited, et al. (In Liquidation), acting by and through the Foreign Representatives thereof,

Plaintiffs,

– against –

ABN AMRO Schweiz AG et al.

Defendants.

Fairfield Sentry Limited, et al. (In Liquidation), acting by and through the Foreign Representatives thereof,

Plaintiffs,

– against –

ABN AMRO Schweiz AG et al.

Ch. 15 Case

Case No. 10-13164 (SMB)

Jointly Administered

Adv. Pro. No. 10-03496 (SMB)

Procedurally Consolidated Under this Matter

Adv. Pro. No. 10-03635 (SMB)

Adv. Pro. No. 10-03636 (SMB)

Defendants.

## RBS COUTTS BANK LTD.'S NOTICE OF JOINDER IN DEFENDANTS' MOTION TO DISMISS AND IN OPPOSITION TO PLAINTIFFS' MOTION FOR LEAVE TO AMEND

RBS Coutts Bank Ltd., now known as Coutts & Co. Ltd. ("Coutts"), by and through its undersigned counsel, submitted the Consolidated Memorandum of Law in Opposition to Plaintiffs' Motion for Leave to Amend and in Support of Defendants' Motion to Dismiss, filed on January 13, 2017, in Adversary Proceeding No. 10-03496 (ECF No. 960), and other related adversary proceedings before this Court.

Coutts hereby joins in the motion to dismiss and supporting documents filed on January 13, 2017, by Clearly Gottlieb Steen & Hamilton, LLP ("Cleary"), in Adversary Proceeding No. 10-03496 (ECF Nos. 959-964) and other related adversary proceedings before this Court, and adopts and fully incorporates by reference those documents and all contemporaneous or subsequent filings by Cleary on behalf of the joint defense group in support of Defendants' motion to dismiss, and in opposition to Plaintiffs' motion for leave to amend.

Coutts submitted the Supplemental Memorandum of Law of Defendants in the Adversary Proceedings Listed on Appendix A in Opposition to Plaintiffs' Motion for Leave to Amend and in Support of Those Defendants' Motion to Dismiss on Grounds of *Forum non Conveniens*, filed on January 27, 2017, in Adversary Proceeding No. 10-03496 (ECF No. 1109) and other related adversary proceedings before this Court.

Coutts hereby joins in the motion to dismiss and supporting documents filed on January 27, 2017 (the "FNC Motion"), by Hogan Lovells US LLP ("Hogan"), in Adversary Proceeding No. 10-03496 (ECF Nos. 1107, 1109, 1111) and other related adversary proceedings before this

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Court, and adopts and fully incorporates by reference those documents and all contemporaneous or subsequent filings by Hogan in support of the FNC Motion.

Coutts hereby joins Section I of the Individual Supplemental Brief (Concerning Preemption and Service), filed on January 26, 2017, by Becker, Glynn, Muffly, Chassin & Hosinski LLP ("Becker Glynn"), in Adversary Proceeding No. 10-03863 (ECF No. 36), and adopts and fully incorporates by reference that section of that document.

Dated: January 27, 2017

New York, New York

## KATTEN MUCHIN ROSENMAN LLP

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